

A. Direct Processors

A.1 Direct Processors

Under the Standard Plan, direct processors will disassemble, dismantle, shred, or otherwise process CEPs to recover, recycle, and otherwise manage materials contained in electronic products. Direct processors handling materials collected by the Authority will ensure that materials are processed in accordance with the processing standards established in WAC 173-900-650 and any additional standards identified in the Authority's Operating Plan or in Authority contracts for processing services. Processors used by the Standard Plan shall provide the Authority, on at least an annual basis, with documentation regarding how they are meeting the applicable performance standards and submit to annual compliance audits meeting the requirements in WAC 173-900-365. Processors must demonstrate that the unwanted electronic products have been received from registered collectors or transporters and provide other documentation, as may be required by the Authority.

Pursuant to WAC 173-900-600, the Authority will contract with any processor that meets the direct processor performance standards and meets any requirements described in the Authority's Operating Plan or through contractual arrangements with the Authority, such as the preferred processing standards adopted by the Authority Board.

As of February 2010 the Authority has contracted with the following direct processors to provide processing services for the Standard Plan, (refer to Table K-1 for more details).

1. IMS Electronics Recycling Management – Vancouver, WA
2. Total Reclaim – Seattle, WA
3. E-Waste, LLC – Lynnwood, WA
4. Electronics Recyclers International – Auburn, WA
5. EWC Group, Inc. – Seattle, WA
6. Ace Metal Co. – Mukilteo, WA
7. E-Tech Recycling – Portland, OR

Direct processors under contract with the Authority will provide information describing the processes and methods used to recycle CEPs. In accordance with WAC 173-900-320(9), direct processors will certify in writing that they will comply with the performance standards for direct processors of CEPs. The Authority will compensate direct processors for the reasonable costs associated with processing unwanted CEPs (see also **Section O, Fair Compensation**).

Following the submission of the Standard Plan, the Authority or its designee will contract with any additional direct processors that meet the direct processor performance standards and meet any requirements described in the Authority's Operating Plan or through contractual arrangements with the Authority.

Table A-1. Direct Processor Contracted with Authority for Standard Plan*Period of Performance: January 1 – December 31, 2010*

<i>Processors Name</i>	<i>Location</i>	<i>Contact Persons Info</i>	<i>Phone</i>	<i>CEP Types Processed</i>
<i>IMS Electronics Recycling Management</i>	<i>2401 Saint Francis LN Vancouver, WA 98660</i>	<i>Ed Siegel General Manager eds@ims-electronics.com</i> <i>David Palenshus Plant Manager David.palenshus@ims-electronics.com</i> <i>Kathrine Rehder EHS Manager kathrine@imselectronics.com</i>	<i>360-750-8883</i> <i>619-917-8806</i> <i>858-679-1555</i>	<i>All CEP's</i>
<i>Total Reclaim, Inc.</i>	<i>2200 6th Ave. S. Seattle, WA 98134</i>	<i>Craig Lorch clorch@totalreclaim.com</i> <i>Peggy Halferty EHS Manager peggyh@totalreclaim.com</i>	<i>206-343-7443</i> <i>206-343-7443</i>	<i>All CEP's</i>
<i>E-Waste LLC.</i>	<i>12424 Beverly Park Road, Suite A-5 Lynnwood, WA 98036</i>	<i>Mary Reading President mary@e-wastes.com</i>	<i>425-239-4118</i>	<i>All CEP's</i>
<i>Electronics Recyclers International</i>	<i>2302 West Valley Hwy, Suite 100 Auburn, WA 98001</i>	<i>Aaron Blum Co-Founder/Chief Compliance Officer ablum@electronicrecyclers.com</i>	<i>559-442-3968</i>	<i>All CEP's</i>
<i>EWC Group, Inc.</i>	<i>660 S. Othello St. Seattle, WA 98108</i>	<i>Clara Jung Regional Vice President clara@ewastecenter.com</i>	<i>206-767-9950</i>	<i>All CEP's</i>
<i>Ace Metal Co.</i>	<i>11110 Mukilteo Speedway, Suite 202 Mukilteo, WA 98275</i>	<i>Elcid Choi Owner elcid@acemetalco.com</i>	<i>425-493-6809</i>	<i>All CEP's</i>
<i>E-Tech Recycling</i>	<i>1600 NE 25th Ave. Suite C Hillsboro, OR</i>	<i>Brent Young Director of Business Development brenty@etechrecycling.com</i>	<i>503-693-8939</i>	<i>All CEP's</i>

A.1.1 Processor Compliance

E-Waste, LLC: ([Review the E-Waste, LLC profile.](#))

Electronics Recyclers International: ([Review the ERI profile.](#))

EWC Group: ([Review the EWC Group profile.](#))

Ace Metal Co.: ([Review the Ace Metal Company profile.](#))

E-Tech Recycling: ([Review the E-Tech Recycling profile.](#))

Total Reclaim: ([Review the Total Reclaim profile.](#))

IMS Electronics Recycling: ([Review the IMS Electronics Recycling profile.](#))

A.1.2 Written Statement of Compliance

On November 25, 2009, **IMS** entered into a written contract with the Authority. By its terms, the contract ensures that IMS will comply with the performance standards for direct processors in WAC 173-900-650 and any additional processing requirements established by the Authority.

On December 30, 2009, **Total Reclaim, Inc** entered into a written contract with the Authority. By its terms the contract ensures that Total Reclaim Inc. will comply with the performance standards for direct processors in WAC 173-900-650 and any additional processing requirements established by the Authority.

On December 9, 2009, **E-Waste, LLC** entered into a written contract with the Authority. By its terms the contract ensures that E-Waste, LLC will comply with the performances standards for direct processors in WAC 173-900-650 and any additional processing requirements established by the Authority.

On December 3, 2009, **ERI** entered into a written contract with the Authority. By its terms the contract ensures that ERI will comply with the performances standards for direct processors in WAC 173-900-650 and any additional processing requirements established by the Authority.

On December 17, 2009, **EWC Group** entered into a written contract with the Authority. By its terms the contract ensures that EWC Group will comply with the performances standards for direct processors in WAC 173-900-650 and any additional processing requirements established by the Authority.

On December 2, 2009, **Ace Metal Co.** entered into a written contract with the Authority. By its terms the contract ensures that Ace Metal Co. will comply with the performances standards for direct processors in WAC 173-900-650 and any additional processing requirements established by the Authority.

On February 4, 2010, **E-Tech Recycling** entered into a written contract with the Authority. By its terms the contract ensures that E-Tech Recycling will comply with the performances standards for direct processors in WAC 173-900-650 and any additional processing requirements established by the Authority.

A.2 Preferred Processing Standards

On December 11, 2007, the Authority adopted the Department of Ecology's voluntary preferred processing standards, as specified in *Environmentally Sound Management and Performance Standards for Direct Processors* (Ecology Publication #07-07-046), published in November 2007.

To receive "preferred status," a direct processor must comply with Ecology's voluntary preferred processing standards for each of the following categories:

1. Responsible Management Priorities
2. Legal Requirements
3. Environmental, Health, and Safety Management Systems (EHSMS)
4. Recordkeeping
5. On-site Requirements
6. Materials of Concern
7. Recycling
8. Reuse
9. Disposal of Residuals
10. Refurbishment
11. Transport
12. Prison Labor
13. Facility Access
14. Notification of Penalties and Violations
15. Due Diligence Downstream
16. Exporting
17. Insurance
18. Closure Plan and Financial Responsibility

19. Facility Security

For each of the above categories, Ecology has identified a minimum performance standard and a “preferred” performance standard. Minimum standards are set forth in WAC 173-900-650. The preferred standards are additional requirements (exceeding the minimum requirements) that Ecology developed to encourage processing and recycling of CEPs in a manner intended to better protect human health and the environment.

Under the Authority’s Standard Plan, all direct processors must meet both the minimum and preferred performance standards. Direct processors must also provide an annual audit documenting compliance with these requirements to receive “preferred status” from Ecology.

A copy of Ecology’s November 2007 preferred performance standards, *Environmentally Sound Management and Performance Standards for Direct Processors*, is included in the remainder of this section.

B. Direct Processor Compliance Audit Reports

B.1 Processor Audit Requirements

To provide services under the Standard Plan, each participating processor must comply with the minimum and preferred performance standards established by the Department of Ecology and any additional processing requirements established by the Authority. To ensure compliance, each direct processor for the Standard Plan must engage a qualified, independent auditor to perform an annual audit of its processing operations and facilities. An auditor is required to have the appropriate knowledge through professional training, certification, and work experience to evaluate the environmental compliance of the processing facility. The auditor may not be employed by the direct processor other than for the purpose of conducting the compliance audit. Direct processors will obtain approval of proposed compliance auditors from the Department of Ecology.

The Authority will provide Ecology with an annual audit for each direct processor performing work under the Standard Plan. This information will include the following items:

- (a) All the performance standards that processors must meet to qualify for work under the Standard Plan (currently, those standards include those identified in Ecology Publication 07-07-046, as the “preferred” performance standards).
- (b) Documentation that the direct processor meets the Plan’s performance standards, including a list of applicable federal, state, and local laws and regulations related to processing activities.
- (c) Documentation of noncompliance with a performance standard: Ecology may excuse a direct processor from compliance with a specific performance standard in WAC 173-900-650 or Ecology Publication 07-07-046 in cases where the national, state, or local laws or rules applicable in a processor’s location and a Plan performance standard conflict. When a conflict exists, the audit report must identify the specific performance standard(s) that is in conflict and provide evidence that the processor is in compliance with the corresponding national, state, or local laws or rules that apply at that location.
- (d) Documents demonstrating the compliance auditor’s accreditation through:
 - (i) ISO Guide 66;
 - (ii) ISO/IEC Standard 17021:2006; or
 - (iii) Another body approved by Ecology.
- (e) Auditor certification of the accuracy of the audit report.

B.2 Processor Audit Report

See a copy of the **E-Waste, LLC** compliance audit report.

See a copy of the **Electronics Recyclers International** compliance audit report.

See a copy of the **EWC Group** compliance audit report.

See a copy of the **Ace Metal Co.** compliance audit report.

See a copy of the **E-Tech Recycling** compliance audit report.

See a copy of the **Total Reclaim** compliance audit report.

See a copy of the **IMS Electronics Recycling** compliance audit report.

C. Direct Processor Contract Face Sheet

As of February 4, 2010, the Authority has contracted with the following processors listed in Table C-1 below to provide direct processing services for CEPs collected under the Standard Plan. A copy of the contract face sheet and signature sheet for the direct processor contracted by the Plan is included in the remainder of this section. The Authority expects to add additional processors as they demonstrate their compliance with the processing standards.

Table C-1. Direct Processor Contract Summary

Processor	Date Contract Signed	Contract Start Date	Contract End Date
IMS Electronics Recycling Management	November 25, 2009	January 1, 2010	December 31, 2010
Total Reclaim, Inc.	December 30, 2009	January 1, 2010	December 31, 2010
E-Waste, LLC	December 9, 2009	January 1, 2010	December 31, 2010
E-Tech Recycling	February 4, 2010	January 1, 2010	December 31, 2010
Electronics Recyclers International	December 3, 2009	January 1, 2010	December 31, 2010
EWC Group, Inc.	December 17, 2009	January 1, 2010	December 31, 2010
Ace Metal Co.	December 2, 2009	January 1, 2010	December 31, 2010

E-Waste, LLC: ([Review the E-Waste, LLC contract face sheet.](#))

Electronics Recyclers International: ([Review the ERI contract face sheet.](#))

EWC Group: ([Review the EWC Group contract face sheet.](#))

Ace Metal Co.: ([Review the Ace Metal Co. contract face sheet.](#))

E-Tech Recycling: ([Review the E-Tech Recycling contract face sheet.](#))

Total Reclaim: ([Review the Total Reclaim contract face sheet.](#))

IMS Electronics Recycling: ([Review the IMS Electronics Recycling contract face sheet.](#))

--END--